

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
VIRGINIA ORTIZ, a/k/a "Sandra Santiago," a/k/a "Mila"	:	VIOLATIONS: 21 U.S.C. § 846 (Conspiracy to distribute heroin - 1 count) 21 U.S.C. § 853 (Criminal forfeiture)

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about September 2001 to in or about October 2002, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

VIRGINIA ORTIZ,
a/k/a "Sandra Santiago,"
a/k/a "Mila"

conspired and agreed with others known and unknown to the grand jury to knowingly and intentionally distribute and possess with intent to distribute in excess of one kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that defendant VIRGINIA ORTIZ was a member of a heroin packaging and distribution organization led by Luis Ramos, a/k/a "Popeye,"

a/k/a “Juan De La Cruz,” charged elsewhere, that was responsible for the acquisition and packaging, for street sale and distribution, of more than 30 kilograms of heroin to members of a Pittsburgh-based street heroin distribution organization.

It was further a part of the conspiracy that:

3. Luis Ramos operated a heroin packaging and distribution operation from Philadelphia, Pennsylvania, in which Ramos obtained multi-hundred gram to multi-kilogram quantities of heroin from heroin sources of supply with links to Colombian-based heroin traffickers.

4. Luis Ramos organized a heroin packaging operation in Philadelphia, Pennsylvania to complete the packaging of bulk quantities of heroin into thirteen-packet bundles ready for street distribution and sale in the Pittsburgh, Pennsylvania area.

5. Luis Ramos assembled and paid a group of heroin packagers, including defendant VIRGINIA ORTIZ, as well as Nicholas De La Cruz, a/k/a “Felix Bernabe,” Natividad Santana, Marlyn Garcia, Anthony Hurtado, a/k/a “Moreno,” Kendys Valdez, a/k/a “Benny,” Larceny Maria Suero and Mayra Ortiz, each charged elsewhere, to assist in transporting, processing and preparing heroin into multi-hundred and thousand bundle quantities, with stamped “brand” names on each glassine packet containing heroin, including “Holle Back,” “Hola,” and “Platinum,” for street distribution and sale.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. From in or about the Fall of 2001 to in or about October 2002, at the direction of

Luis Ramos, at two to three week intervals, defendant VIRGINIA ORTIZ and Nicholas De La Cruz, Marlyn Garcia, Anthony Hurtado, Natividad Santana, and Mayra Ortiz assisted in transporting, processing and preparing multi-kilogram quantities of heroin into numerous packets ranging from one thousand to seven thousand bundles (13,000 to 91,000 packets) intended for street distribution and sale, stamped with “brand” logos including “Platinum,” “Holle Back,” and “Hola.”

2. In or about January 2002, defendant VIRGINIA ORTIZ and Natividad Santana attempted to recruit Larceny Maria Suero to package heroin for Luis Ramos and offered to compensate her for her services at the rate of \$500 to \$700 per heroin packaging session.

3. From in or about the Fall of 2001 to in or about October 2002, on various occasions, Natividad Santana, assisted by defendant VIRGINIA ORTIZ, obtained and supplied to Luis Ramos multi-hundred gram quantities of heroin to be used by the members of the conspiracy in the heroin packaging process.

All in violation of Title 21, United States Code, Section 846.

NOTICE OF FORFEITURE

As a result of the violation of Title 21, United States Code, Section 846, as set forth in Count One of this indictment, defendant

VIRGINIA ORTIZ

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, the following property:

A. Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 21, United States Code, as charged in this indictment, including, but not limited to: (1) the sum of \$5,000 in United States currency representing proceeds from the sale and distribution of heroin.

B. Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 21, United States Code, as charged in this indictment, including, but not limited to: (1) the sum of \$5,000 in United States currency representing proceeds from the sale and distribution of heroin.

C. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant VIRGINIA ORTIZ,

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney